

Application No.: 09/547,369

Docket No.: 20421-00059-US

REMARKS

Withdrawal of the rejection of claims 1-4, 8-11 and 14-17 under 35 U.S.C. § 102(e) as being anticipated by Chiang (U.S. Pat. No. 6,445,709). As pointed out in the Applicants Response filed September 17, 2003, Chiang (U.S. Pat. No. 6,445,709) does not disclose or suggest any means for learning MAC addresses locally to a target port. The Examiner has commented, in item no. 7 in the Final Rejection, that:

The Examiner submits that the alleged limitations is still not sufficient to define the invention over Chiang (U.S. Pat. No. 6,445,709). In Chiang the routing tables provided with a multi-port switch and hence is considered to be local to all the ingress and target ports.

It is submitted that a routing table is not, *per se*, structure which is used to learn source addresses for messages which reach target ports. Further, it is not believed that Chiang (U.S. Pat. No. 6,445,709) discloses the use of a routing table at each target port. In reviewing the reference, it is unclear what is meant by a "routing table". There is disclosed within the cited reference a structure for making forwarding decisions for the received data packets, but this structure can not be defined as any data base located at each target port as is required by the claims. Further, there is no structure disclosed for recording a source MAC address in the local data base along with a port ID connected to the first (source) device.

Withdrawal of the rejection of claims 5, 7, 12, 18 and 20 under 35 U.S.C. § 103 as being unpatentable over Chiang (U.S. Pat. No. 6,445,709) in view of Brice, Jr. et al. (U.S. Pat. No. 4,825,206) is requested. The Brice, Jr. et al. reference describes a type of automatic feedback network operable between nodes of a communication network. The device disclosed in Brice, Jr. et al. (U.S. Pat. No. 4,825,206) provides information as to the status of a node to other nodes which have attempted communication to it. A routing table is provided for having one of two states, indicating when a route is created, and when a route failure notification is either returned from a route set-up attempt or is received on an active route from another node.

The reference fails to disclose any learning of any source device address at a target port connected to a destination device. Accordingly, the combination of a reference which teaches

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node feedback processes using a node routing table, when combined with Chiang (U.S. Pat. No. 6,445,709) fails to disclose any system which can learn source addresses at a target port.

Withdrawal of the rejection of claims 8-11 under 35 U.S.C. § 103 as being unpatentable over Chiang (U.S. Pat. No. 6,445,709) in view of Holt et al. (U.S. Pat. No. 5,790,545) is requested. Holt et al. (U.S. Pat. No. 5,790,545) allegedly discloses a multi-port switch utilizing distributed routing tables where each target port comprises a processor and a memory configured for storing packet information for setting up a routing/connection table for routing the packet from the ingress port to the target port (Final Rejection item no. 4).

In reviewing Holt's Fig. 9 and col. 14, line 50 - col. 15, line 42, a description is provided of the protocol between an ingress and egress port. The description describes a protocol which stores information packets in an ingress memory, and updates que status information associated with the connection between ingress and egress port. When a connection identifier is received from a scheduler of an egress port, the packets are retrieved from the corresponding que in the ingress memory. The reference does not disclose at the cited passage any learning of a source address or storing it in any data base associated with a target port or egress port. The reference only describes a que for sending an arrival tag containing a connection identifier to a destination egress port so that the egress port knows a packet is waiting for it.

No where in the reference is it suggested that a source address is learned at an egress or target port, as is required by the claims.

It is clear that if Holt et al. (U.S. Pat. No. 5,790,545) is combined with Chiang (U.S. Pat. No. 6,445,709), there is no resulting structure which would suggest a data base at a egress or target port which stores source addresses, so that return messages can be expeditiously routed to a source device. Accordingly, the combination of references does not render obvious the rejected claims.

Withdrawal of claim 12 as being unpatentable under 35 U.S.C. § 103 in view of Chiang (U.S. Pat. No. 6,445,709) and Holt et al. (U.S. Pat. No. 5,790,545) further in view of Brice, Jr. et al. (U.S. Pat. No. 4,825,206), is requested. Brice's device, as described in col. 10, lines 20-43, is directed to routing tables which are used to indicate a failure along a connection route. Nothing

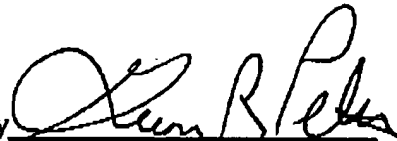
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appears in Brice, Jr. et al. (U.S. Pat. No. 4,825,206) which suggests the subject matter of claim
12 which requires MAC addresses to be bundled and sent to a control point within a network
switch.

In view of the foregoing, where it has been demonstrated that none of the references
teach or suggest learning the source addresses at the target port, and, therefore, the advantage the
structure provides when returning messages to the source address, favorable reconsideration is
believed to be in order.

Applicant believes no fee is due with this response. However, if a fee is due, please
charge our Deposit Account No. 22-0185, under Order No. 20421-00059-US from which the
undersigned is authorized to draw.

Dated: 1/12/03

Respectfully submitted,

By 
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